

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MAR - 2 2022

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIT SAM COOC and CUONG QUOC
DUONG,

Defendants.

4:22CR00117 SRC/PLC

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning at a time unknown, but including January of 2021 and continuing thereafter to the date of this Indictment, in the Eastern District of Missouri and elsewhere,

TIT SAM COOC, and CUONG QUOC DUONG,

the defendants herein, did combine, conspire, and agree with each other, and with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with the intent to distribute controlled substances to include marijuana, a Schedule I controlled substance; and that while conducting and attempting to conduct such financial transactions, the defendants knew that

the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT II

The Grand Jury further charges that:

Beginning at a time unknown, but including February, 3, 2021, and continuing thereafter to the date of this Indictment, in the Eastern District of Missouri,

TIT SAM COOC, and CUONG QUOC DUONG,

the defendants herein, did knowingly and intentionally conspire, combine, confederate and agree together with other persons known and unknown to this Grand Jury, to possess with the intent to distribute controlled substances, to wit, marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). All in violation of Title 21, United States Code, Section 846, and punishable under Title 21, United States Code, Section 841(b)(1)(D).

COUNT III

The Grand Jury further charges that:

On or about February 3, 2021, in St. Charles, State of Missouri, within the Eastern District of Missouri,

TIT SAM COOC, and CUONG QUOC DUONG,

the defendants herein, did knowingly and intentionally possess with the intent to distribute marihuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and punishable under Title 21, United States Code, Section 841(b)(1)(D).

COUNT IV

The Grand Jury further charges that:

A. Beginning at a time unknown, but including January and February of 2021, and continuing thereafter to the date of this Indictment, in the Eastern District of Missouri and elsewhere,

TIT SAM COOC, and CUONG QUOC DUONG,

the defendants herein, did knowingly and unlawfully combine, conspire, agree, and confederate together with each other and other persons, both known and unknown to the Grand Jury, for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, to structure and assist in structuring, transactions with domestic financial institutions, in violation of Title 31, United States Code, Sections 5324(a) and punishable by 5324(d) and Title 31, Code of Federal Regulations, Section 103.11.

B. Defendants committed overt acts in furtherance of the conspiracy, including, but not limited to, purchasing United States Postal Money Orders in order to avoid reporting requirements under section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder.

<u>Date</u>	<u>Amount</u>	<u>Financial Institution</u>	<u>Type</u>
01-23-21	\$1,000.00	Post Office 350202	Postal Money Order
01-23-21	\$1,000.00	Post Office 352282	Postal Money Order
01-23-21	\$1,000.00	Post Office 350203	Postal Money Order
01-23-21	\$1,000.00	Post Office 350203	Postal Money Order
01-23-21	\$1,000.00	Post Office 350202	Postal Money Order
02-01-21	\$1,000.00	Post Office 631261	Postal Money Order
02-01-21	\$1,000.00	Post Office 631261	Postal Money Order
02-01-21	\$500.00	Post Office 631261	Postal Money Order

02-01-21	\$1,000.00	Post Office 630510	Postal Money Order
02-01-21	\$1,000.00	Post Office 630250	Postal Money Order
02-01-21	\$500.00	Post Office 630250	Postal Money Order
02-01-21	\$500.00	Post Office 630110	Postal Money Order
02-01-21	\$1,000.00	Post Office 630250	Postal Money Order
02-01-21	\$1,000.00	Post Office 630110	Postal Money Order
02-01-21	\$1,000.00	Post Office 630110	Postal Money Order
02-01-21	\$500.00	Post Office 630170	Postal Money Order
02-01-21	\$1,000.00	Post Office 630170	Postal Money Order
02-01-21	\$1,000.00	Post Office 633031	Postal Money Order
02-01-21	\$1,000.00	Post Office 633031	Postal Money Order
02-01-21	\$1,000.00	Post Office 633010	Postal Money Order
02-01-21	\$1,000.00	Post Office 633010	Postal Money Order
02-01-21	\$1,000.00	Post Office 630170	Postal Money Order
02-01-21	\$500.00	Post Office 633031	Postal Money Order
02-01-21	\$500.00	Post Office 633010	Postal Money Order
02-01-21	\$500.00	Post Office 630400	Postal Money Order
02-01-21	\$1,000.00	Post Office 630400	Postal Money Order
02-01-21	\$1,000.00	Post Office 630400	Postal Money Order
02-01-21	\$500.00	Post Office 630100	Postal Money Order
02-01-21	\$1,000.00	Post Office 630100	Postal Money Order
02-01-21	\$1,000.00	Post Office 630100	Postal Money Order
02-01-21	\$1,000.00	Post Office 630520	Postal Money Order
02-01-21	\$1,000.00	Post Office 630520	Postal Money Order
02-01-21	\$800.00	Post Office 630510	Postal Money Order
02-01-21	\$1000.00	Post Office 63510	Postal Money Order

02-01-21	\$500.00	Post Office 630520	Postal Money Order
02-01-21	\$1000.00	Post Office 631631	Postal Money Order
02-01-21	\$1,000.00	Post Office 631631	Postal Money Order
02-01-21	\$500.00	Post Office 631631	Postal Money Order
02-02-21	\$1,000.00	Post Office 351270	Postal Money Order
02-02-21	\$1,000.00	Post Office 351270	Postal Money Order
02-02-21	\$1,000.00	Post Office 350610	Postal Money Order
02-02-21	\$1,000.00	Post Office 350640	Postal Money Order
02-02-21	\$1,000.00	Post Office 350640	Postal Money Order
02-02-21	\$1,000.00	Post Office 350610	Postal Money Order
02-02-21	\$1,000.00	Post Office 352181	Postal Money Order
02-03-21	\$1,000.00	Post Office 633031	Postal Money Order
02-03-21	\$1,000.00	Post Office 633031	Postal Money Order
02-03-21	\$800.00	Post Office 633031	Postal Money Order
02-03-21	\$1,000.00	Post Office 633010	Postal Money Order
02-03-21	\$1,000.00	Post Office 633010	Postal Money Order
02-03-21	\$800.00	Post Office 633010	Postal Money Order

All in violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956(h), as set forth in Count I of the Indictment, the defendants shall forfeit to the United States of America any property, real or personal, involved in such offense, or any property traceable to such property. Also subject to

forfeiture is a sum of money equal to the total value of property, real or personal, involved in said offense and all property, real or personal, traceable to the offense charged in Count I.

2. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Counts II, and III, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense. Also subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to the offense charged in Counts II and III.

3. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 371 as set forth in Count IV, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violation. Also subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to the offense charged in Count IV.

4. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

RICARDO DIXON, #70026MO
Assistant United States Attorney